

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED
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DEC 09 2024

DERRICK LEE CARDELLO-SMITH, #267009,
Plaintiff,

U.S. DISTRICT COURT
EASTERN MICHIGAN

Vs

Case no 2:24-cv-12647

SEAN COMBS,
Defendant,

Hon. Judith Levy

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NOTICE OF PLAINTIFFS SUBMISSION OF MATERIAL WITNESSES
JENNIFER LYNN LOPEZ a/k/a/"(J-LO)"a/k/a "Jenny From The Block"
KIRK BURROWS, FORMER EMPLOYEE OF DEFENDANT COMBS IN 1997, AND
DERRICK PALMER, NEW YORK POLICE OFFICER AWARE OF DEFENDANTS
CRIMINAL ACTIVITY WILL BE CALLED AS MATERIAL WITNESSES AND EXPERTS
TO SEAN COMBS VIEWING, POSSESSION, AND DISTRIBUTION OF
HIS SEXUAL ASSAULT UPON THE PLAINTIFF IN 1997 AND THE
ORDERS OF DEFENDANT SEAN COMBS FORCING JENNIFER LOPEZ TO REMAIN
SILENT ABOUT THE VIDEO TAPED SEXUAL ASSAULT OF PLAINTIFF BY DEFENDANT

Please take notice that Plaintiff, Derrick Lee Cardello-Smith hereby places the Court and Defendants Attorney on Notice that the Plaintiff is submitting the Material witness of JENNIFER LYNN LOPEZ, J-LO), JENNY FROM THE BLOCK as a material witness to the Following events and will call Jennifer Lopez as a Witness to the Events described herein to testify in this matter--

Between the Time Period of January 1, 1999 through December 31, 2021, She was Forced to View, Watch, Hear, see, and observe the Defendants Sexual Assault of this

Plaintiff by Defendant Sean Combs in the 1997 Incident Described and outlined within the Complaint now before this Court."

Plaintiff states that the Material witness JENNIFER LYNN LOPEZ also known as J-LO and JENNY FROM THE BLOCK was engaged in a relationship with the Defendant Sean Combs during 1999 and 2001, and that the Sexual Assault of the Plaintiff was recorded, distributed and held by the Defendant at his New York Residence and Recording Studio and During the Relationship with Jennifer Lopez, She was made privy to this Video that was taken by Sean Combs and his Employee Kirk Burrows, and that during the time of the rape by defendant upon this plaintiff, Mr. Kirk Burrows, was in full attendance of the Drugging, Beating and Sexual Assault of the Plaintiff by Defendant Combs and that she (J-LO) has known this Video Existed and was in existence and took no action to make it known to anyone in law enforcement and that she was even questioned by New York Police Detective DERRICK PARKER about this matter and that the report will show that he answers to this Tape was and still remains, as resounding YES, to its existence, and Plaintiff even further states that the Persons named as Material Witnesses to the rape of this Plaintiff by defendant, the keeping of the Video of the Rape of this Plaintiff by defendant, the witness Jennifer Lynn Lopez being forced to remain quiet about this type detailing the horrible rape of this Plaintiff by the Defendant, and doing so under pressure and her own victimization by Defendant Sean Combs.

Plaintiff intends to call Mr. Kirk Burrows as a witness in this matter because not only was he in attendance with then Plaintiff was Drugged, Beaten and Raped by defendant Sean Combs, he actually recorded the assault and kept the Footage of the Rape by the Defendant upon this Plaintiff.

Plaintiff will call Officer Derrick Palmer as that he is familiar with the Questioning or the Witness Jennifer Lopez and his own referral of this matter to the Detroit Police and Adrian Police Department, and their failure to follow up on this matter, and his own history of the criminal patterns of the Defendant Sean Combs and Jennifer Lopez being a Victim of Mr. Combs as well.

Plaintiff fully intends to and will call these members of the Community as that they are material witnesses to the actions of the Defendant and his Continuing Pattern of behavior and other acts committed upon this Plaintiff, and Plaintiff Intends to call these named individuals to this Court for Testimony on these matters and others related to this Sexual Assault by the Defendant upon the Plaintiff, and submits it to this Court.

Please let the record reflect this Intent and notify the Plaintiff the Court has processed it.

Thank you for your time in this matter.



Mr. Derrick Lee Cardello-Smith

12-2-24

#267009

E.C. Brooks Correctional Facility
2500 S. Sheridan Drive
Muskegon, MI 49444

Mr. Derrick Lee Cardello-Smith
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Mailed on 12-2-2
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